

SCHNITZER JOHNSON & WATSON, CHTD.  
8985 S. Eastern Ave., Ste. 200  
Las Vegas, Nevada 89123  
(702) 362-6666

GARY E. SCHNITZER, ESQ.  
Nevada Bar No. 395  
L. RENEE GREEN, ESQ.  
Nevada Bar No. 12755  
LESLIE L. PHIEFER, ESQ.  
(Admitted *Pro Hac Vice*)  
SCHNITZER JOHNSON & WATSON, CHTD.  
8985 So. Eastern Avenue, Suite 200  
Las Vegas, Nevada 89123  
Telephone: (702) 362-6666  
Facsimile: (702) 362-2203  
[gschnitzer@sjwlawfirm.com](mailto:gschnitzer@sjwlawfirm.com)  
[rgreen@sjwlawfirm.com](mailto:rgreen@sjwlawfirm.com)  
[lphiefer@sjwlawfirm.com](mailto:lphiefer@sjwlawfirm.com)  
*Attorneys for Defendant,*  
*HANKINS PLASTIC SURGERY*  
*ASSOCIATES, P.C. dba HANKINS*  
*& SOHN PLASTIC SURGERY*  
*ASSOCIATES*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

IN RE HANKINS PLASTIC SURGERY  
ASSOCIATES, P.C. dba HANKINS & SOHN  
PLASTIC SURGERY ASSOCIATES

This Document Relates to: All Actions

Master File No. 2:23-cv-00824-RFB-DJA

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE THE  
DEADLINE FOR DEFENDANT  
HANKINS PLASTIC SURGERY  
ASSOCIATES, P.C. dba HANKINS &  
SOHN PLASTIC SURGERY  
ASSOCIATES TO FILE ITS RESPONSE  
TO PLAINTIFFS' MOTION FOR  
LEAVE TO FILE SECOND AMENDED  
CONSOLIDATED CLASS ACTION  
COMPLAINT AND TO FILE A  
PORTION OF AN EXHIBIT UNDER  
SEAL PURSUANT TO LR 10-5(A)**

Defendant Hankins & Sohn Plastic Surgery Associates, P.C. dba Hankins & Sohn Plastic Surgery Associates ("Defendant") by and through its counsel of record, SCHNITZER JOHNSON & WATSON, CHTD., Plaintiffs Jennifer Tausinga, Alysia Wrenn, Olga Romashova, and Caroline Aurora (collectively "Plaintiffs") on behalf of themselves and all other similarly situated, by and through co-interim counsel of record, Jennifer A. Fornetti of The Bourassa Law Group and Nicholas A. Colella of Lynch Carpenter LLP and Plaintiffs' steering committee, Raina Borrelli of

///

8985 S. Eastern Ave., Ste. 200  
Las Vegas, Nevada 89123  
(702) 362-6666

SCHNITZER JOHNSON & WATSON, CHTD.

Turke & Strauss LLP, Ramzy Ladah and Daniel C. Tetreault of Ladah Law Firm, and Clark Seegmiller and Jonathan B. Lee of Richard Harris Law Firm, hereby stipulate to the following:

WHEREAS Plaintiffs JENNIFER TAUSINGA, ALYSIA WRENN, AND OLGA ROMOSHOVA filed their Motion for Leave to File Second Amended Consolidated Class Action Complaint and to File a Portion of an Exhibit Under Seal Pursuant to LR IA 10-5(A) (“Motion for Leave”) on September 23, 2024 [ECF No. 63].

WHEREAS the deadline for Defendant to file its Response to the Motion for Leave is October 7, 2024, pursuant to the Local Rules of Practice for the United States District Court for the District of Nevada;

IT IS HEREBY STIPULATED between the parties that Defendant has until October 21, 2024, to file its Response to Plaintiffs’ Motion for Leave.

**IT IS SO STIPULATED.**

DATED this 4th day of October, 2024.

**THE BOURASSA LAW GROUP**

/s/ Jennifer A. Fornetti  
MARK J. BOURASSA, ESQ.  
Nevada Bar No. 7999  
JENNIFER A. FORNETTI, ESQ.  
Nevada Bar No. 7644  
VALERIE S. GRAY, ESQ.  
Nevada Bar No. 14716  
2350 W Charleston Blvd, Suite 100  
Las Vegas, Nevada 89102  
*Attorneys for Plaintiff*  
*Jennifer Tausinga*

**SCHNITZER JOHNSON & WATSON, LTD.**

/s/ L Renee Green  
GARY E. SCHNITZER, ESQ.  
Nevada Bar No. 395  
L. RENEE GREEN, ESQ.  
Nevada Bar No. 12755  
LESLIE L. PHIEFER, ESQ.  
(Admitted *Pro Hac Vice*)  
8985 S. Eastern Ave., Ste. 200  
Las Vegas NV 89123  
*Attorneys for Defendant*  
*Hankins Plastic Surgery Associates, P.C. dba*  
*Hankins & Sohn Plastic Surgery Associates*

8985 S. Eastern Ave., Ste. 200  
Las Vegas, Nevada 89123  
(702) 362-6666

SCHNITZER JOHNSON & WATSON, CHTD.

**LYNCH CARPENTER LLP**

/s/ Nicholas A. Colella  
NICHOLAS A. COLELLA  
Admitted *Pro Hac Vice*  
1133 Penn Avenue, 5<sup>th</sup> Floor  
Pittsburgh, PA 15222  
*Attorneys for Plaintiff*  
*Jennifer Tausinga*

**TURKE & STRAUSS LLP**

/s/ Raina Borelli  
RAINA BORRELLI, ESQ.  
(Admitted *Pro Hac Vice*)  
613 Williamson Street, Suite 201  
Madison, Wisconsin 53703  
*Attorneys for Plaintiff*  
*Olga Romashova*

**IT IS SO ORDERED.**

**DATED:** October 7, 2024

**LADAH LAW FIRM**

/s/ Daniel C. Tetreault  
RAMZY P. LADAH  
Nevada Bar No. 11405  
DANIEL C. TETREAULT, ESQ.  
Nevada Bar No. 11473  
517 S. Third Street  
Las Vegas, NV 89101  
*Attorneys for Plaintiff*  
*Alysia Wrenn*

**RICHARD HARRIS LAW FIRM**

/s/ Jonathan B. Lee  
CLARK SEEGMILLER, ESQ.  
Nevada Bar No. 3873  
JONATHAN B. LEE, ESQ.  
Nevada Bar No. 13524  
801 South Fourth Street  
Las Vegas, NV 89101  
*Attorneys for Plaintiff*  
*Caroline Aurora*



**RICHARD F. BOULWARE, II**  
**UNITED STATES DISTRICT JUDGE**